

# DRAFT

## Phase II Balance System Test Proposal for Gasoline Dispensing Facilities Shut down at Night

### Purpose

The California ARB has stated that Phase II Balance systems may or may not need a processor to become full EVR complaint per the regulations in CP-201. To address this issue, the ARB has requested that a test be run at a Gasoline Dispensing Facility that is shut down at night, during the winter where fuel RVP is unlimited. To provide evidence that a balance system will not require a processor, testing criteria was established between Industry and the ARB. After the ARB reviews the test data submitted, a report will be issued. This report will be available for manufacturers applying for Phase II EVR Balance approval to use in their application.

### Gasoline Dispensing Facility (GDF) Specifics

- Phil-Tite EVR Phase I system.
- Station throughput of about 170,000 gallons/month
- Operation hours: 5 am to 11 pm (6 hours of shutdown with no fuel dispensing. Station owner is being compensated to allow these operation hours.)
- INCON ISD system installed by Franklin Fueling Systems.
- Gilbarco Encore balanced dispensers
- Hanging hardware for the 12 fueling points
  - Goodyear Whip and Long Hoses - all
  - Emco Wheaton nozzles and STB – 6 fueling points
  - Husky nozzles and STB – 6 fueling points
  - Extras of the above equipment will be required to change out if a drive off occurs. Each nozzle company to send 10 nozzles and STB's. 18 hose sets to be supplied by Goodyear.

### Test Procedure

- CARB to outfit the GDF with equipment that monitors the system and atmospheric pressures. Set up in accordance with TP-201.7 (Continuous Pressure Monitoring)
- CARB to perform the pre-test 2" H<sub>2</sub>O Static Pressure Decay test in accordance with TP-201.3.
- Start test around January 10<sup>th</sup>, 2005.
- Fuel drops will be random except when a pressure decay test is scheduled per TP-201.3 requirements.
- CARB to take RVP fuel samples once a week. (ARB will inform the test participants if they cannot perform these duties, if not industry to schedule.)
- CARB to perform 2" H<sub>2</sub>O Static Pressure Decay Test in accordance with TP-201.3 at weekly intervals in order to capture valid data sets. These tests are to be conducted during the station down time.
- CARB to perform post-test 2" H<sub>2</sub>O Static Pressure Decay Test in accordance with TP-201.3.
- Data collection period is considered complete when 30 days of UST data are collected per CP-201 Section 13.3.4.

Franklin Fueling Systems will be monitoring the pressure data at the site very closely. In addition, a web site has been established for anyone to view at [?????](#).

#### Component Failures

If at any time during the test a component fails, or a drive off occurs, the following action is to be taken:

- Drive Off – all equipment at that fueling point to be replaced.
- Component Failure – that component to be replaced. These failures can be identified TP-201.3 or by monitoring the pressure data (not alarm conditions).

When a failure occurs, the ARB staff is to be notified in order to determine the next steps, e.g. schedule the next pressure decay test.

#### Data Analysis

Franklin Fueling Systems will summarize the data into a Test Report. There are several instances that will require some data to be excluded from the analysis, which are:

- If at any time during the test there is equipment failure, the data during that time period is to be eliminated from the 30 day pressure average and the test is to be extended by that time period.
- Improper Phase I deliveries will also be excluded from the data analysis.
- Dates when there are pressure decay tests, those days will be removed from the 30 day pressure average.

Test Report Requirements for submittal to the ARB:

- Data sets that capture 30 days of UST pressure data and computed in accordance to CP-201, Section 4.6 Underground Storage Tank Pressure Criteria.
- ORVR Penetration percentage by analyzing the ISD data.
- Fuel RVP reports – High, Low, and Average values.
- 2" H<sub>2</sub>O Static Pressure Decay Test data in accordance with TP-201.3 supplied by the ARB.

#### Approval

The industry participants will submit a Test Report to Mr. George Lew of the California ARB staff. The ARB will then review the report and determine if it meets the above submittal requirements. If deemed acceptable, the ARB will then review the data to determine if it meets the requirements in CP-201. If the data satisfies CP-201, the ARB will issue a report stating: This test demonstrates that a Phase II Balance System meets the pressure profile requirements as written in CP-201, Section 4.6.5 for a period of 30 days w/o the aid of a processor. If the data does not satisfy CP-201, the ARB will issue a report stating as such.